

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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In Re: COOK MEDICAL, INC., IVC FILTERS  
MARKETING, SALES PRACTICES AND  
PRODUCTS LIABILITY LITIGATION

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Case No. 1:14-ml-2570-RLY-TAB  
MDL No. 2570

This Document Relates to:

*Dennis Alan Seckman*

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Civil Case No.: 1:21-cv-06538-RLY-TAB

**PLAINTIFF'S MOTION FOR SUBSTITUTION OF PARTY**

Plaintiff Dennis Alan Seckman, by and through his adult son, David A. Seckman and his attorneys Rueb Stoller Daniel, LLP and hereby moves this Court pursuant to Fed. R. Civ. P. 25 to substitute David A. Seckman as representative of the Estate of Dennis Alan Seckman in this matter in place of Dennis Alan Seckman in the above captioned action. As grounds therefore, plaintiff states as follows:

1. On January 18, 2024 plaintiff Dennis Alan Seckman passed away.
2. David A. Seckman is the adult son and representative of the estate of the deceased Plaintiff. *See*, Letters of Administration attached hereto as Exhibit A.
3. Rule 25 of the Fed. R. Civ. P. allows for the substitution of a party in the event of death.
4. Notice of Death was provided on October 10, 2024. *See* MDL Dkt. #26129.

WHEREFORE, Plaintiff respectfully requests that this Court allow the substitution of David A. Seckman as representative of the Estate of Dennis Alan Seckman in this matter in place of deceased Plaintiff Dennis Alan Seckman.

Dated: October 24, 2024

Respectfully submitted,

/s/ Dennis Alan Seckman

Deceased Plaintiff

By his attorneys,

/s/Matthew R. Lopez

Matthew R. Lopez

(Admitted Pro Hac Vice, CA Bar No. 263134)

RUEB STOLLER DANIEL, LLP

120 Vantis Drive

Suite 430

Aliso Viejo, CA 9265

Telephone: 949-691-1532

Email: matt@lawrsd.com

***Counsel for Plaintiffs***

**Certificate of Service**

I, Matthew R Lopez , hereby certify that a copy of the foregoing document has been electronically served upon all counsel of record on October 24, 2024.

/s/ Matthew R. Lopez

Matthew R. Lopez

# EXHIBIT A

United States of America

State of West Virginia



County of Wayne, ss:

## Letter of Administration

Estate of DENNIS ALAN SECKMAN

I, Craig Evans, Clerk of the Wayne County Commission, in the State of West Virginia, do hereby certify that DAVID A SECKMAN was on the 19th day of April, 2024, appointed by the County Clerk of the Wayne County Commission as administrator(s) of the Estate of DENNIS ALAN SECKMAN, duly qualified as such by taking oath prescribed by law, and by giving approved bond in the sum of \$0.00, as required by law.

NOW THEREFORE, be it known that said appointment is now in full force and effect and that full faith and credit are due and should be given to all the acts of the said DAVID A SECKMAN as such administrator(s) of the Estate of DENNIS ALAN SECKMAN, as well in all jurisdictions, as elsewhere.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Wayne County Commission at my office in said County on the 19th day of April, 2024.

*Craig Evans*

Craig Evans  
Clerk of the Wayne County Commission



By *Andrea Ellis*

Andrea Ellis  
Deputy Clerk